

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

No. 3:18-500-B

CHRISTOPHER AUNDRE FAULKNER

GOVERNMENT’S UNOPPOSED MOTION TO SUSPEND PRE-TRIAL DEADLINES
PENDING SUPERSEDING INDICTMENT

On October 23, 2018, the defendant pled guilty to a three count Information charging securities fraud in violation 15 U.S.C. § 77q(a), Illegal Monetary Transactions in violation of 18 U.S.C. § 1957, and Income Tax Evasion in violation of 26 U.S.C. § 7201. At the sentencing on April 2, 2019, the Court rejected the parties’ plea agreement. Thereafter on April 15, 2019, the defendant filed a motion to withdraw his plea pursuant to Fed. R. Crim. P. 11(c)(5). The Court granted the motion to withdraw the plea on April 22, 2019.

Also on April 22, 2019, the Court issued a separate Pretrial Order setting the case for trial on July 1, 2019. The order set a discovery deadline of May 6, 2019 and a pre-trial motion deadline of May 23, 2019. (Dkt. 62).

On April 24, 2019, counsel for the defendant filed a motion to withdraw or alternatively to be appointed as CJA counsel. This motion has been referred to United States Magistrate Rebecca Rutherford and is still pending.

The government expects that on May 14, 2019, it will present a superseding

indictment to a Grand Jury that expands the charges against the defendant. The government moves the Court to temporarily suspend the current pre-trial guidelines pending the return of the superseding indictment by the Grand Jury.

The discovery relating to the superseding indictment is voluminous and includes extensive digital data reaching over 80 terabytes. The government also requests that upon return of the superseding indictment, the Court issue a new trial scheduling order which allows the parties to first meet and confer for the purpose of identifying the extent, timing, and means of production of the discovery, and thereafter submit a recommended time table for discovery and pre-trial motions to the Court.

Respectfully submitted,

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UNITED STATES ATTORNEY

s/Christopher Stokes
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CERTIFICATE OF CONFERENCE

On April 29, 2019, I conferred by email with Brian Poe, counsel for the defendant, regarding the foregoing motion. Counsel had no objection.

s/Christopher Stokes
CHRISTOPHER STOKES
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2019, this document was served on the counsel for the defendant by means of the filing with the court's electronic case filing system.

s/Christopher Stokes
CHRISTOPHER STOKES
Assistant United States Attorney